

RANALLI ZANIEL FOWLER & MORAN, LLC  
2340 W. HORIZON RIDGE PARKWAY, SUITE 100  
HENDERSON, NEVADA 89052  
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

**GEORGE M. RANALLI, ESQ.**

Nevada Bar No. 5748

**MAEGUN MOOSO, ESQ.**

Nevada Bar No. 15067

**RANALLI ZANIEL FOWLER & MORAN, LLC**

2340 W. Horizon Ridge Parkway, #100

Henderson, Nevada 89052

Telephone: (702) 477-7774

Facsimile: (702) 477-7778

[ranalliservice@ranallilawyers.com](mailto:ranalliservice@ranallilawyers.com)

Attorneys for Defendant

COSTCO WHOLESALE CORPORATION

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MEIZHEN WANG, individually,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION,  
a Washington Corporation; DOE  
EQUIPMENT OPERATOR; DOES 2-20  
and ROE BUSINESS ENTITIES 1-20  
inclusive,

Defendants.

Case No. 2:23-cv-01097-JAD-BNW

**STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES – EXPERT  
DEADLINES ONLY (SECOND REQUEST)**

Defendants, Costco Wholesale Corporation (Defendant), by and through their attorneys of record, GEORGE M. RANALLI, ESQ. and MAEGUN C. MOOSO, ESQ. of the law firm RANALLI ZANIEL FOWLER & MORAN, LLC, and Plaintiff, Meizhen Wang (Plaintiff), by and through her attorneys of record CLARK SEEGMILLER, ESQ., of the RICHARD HARRIS LAW FIRM to hereby request this Honorable Court to extend the expert deadlines only as requested herein.

I. LOCAL RULE 6-1 IS SATISFIED

This is the second request for an extension of discovery deadlines filed by the parties. However, this request is only for an extension of experts. This Stipulation and request for extension of discovery dates is made more than twenty-one (21) days before the expiration of the deadline for discovery in this case, which is currently September 30, 2024, with initial experts due July 1, 2024.

Pursuant to the controlling Discovery Plan, the following dates govern for purposes of discovery:

- |                                |                    |
|--------------------------------|--------------------|
| 1. Discovery Cutoff Date:      | September 30, 2024 |
| 2. Initial Expert Disclosure:  | July 1, 2024       |
| 3. Rebuttal Expert Disclosure: | August 2, 2024     |
| 4. Dispositive Motions:        | October 29, 2024   |
| 5. Joint Pre-Trial Order:      | November 29, 2024  |

This requested extension will not change any deadline other than the current expert deadline and the current rebuttal deadline.

The parties have already begun the discovery process including taking relevant depositions, obtaining medical records and bills and conducting discovery amongst the relevant parties. The parties believe that adjusting the expert disclosure deadline by agreement will increase efficiencies in the case and possibly obviating the need for the retention of certain experts. If so, this will decrease the cost of the litigation.

According the parties are requesting to extend the expert deadline to September 2, 2024 and the rebuttal deadline to September 30, 2024.

Based on the foregoing, the parties have agreed to the extension.

The instant request comports with Local Rule 6-1, in that no request is made after the expiration of the specified period.

II. THE FOLLOWING DISCOVERY HAS BEEN COMPLETED

1. Plaintiff's Initial List of Witnesses and Documents Pursuant to FRCP 26(a);
2. Plaintiff's First Supplement to Initial List of Witnesses and Documents Pursuant to FRCP 26(a);

RANALLIZANIEL FOWLER & MORAN, LLC  
2340 W. HORIZON RIDGE PARKWAY, SUITE 100  
HENDERSON, NEVADA 89052  
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

- 1 3. Plaintiff's Second Supplement to Initial List of Witnesses and Documents Pursuant to
- 2 FRCP 26(a);
- 3 4. Plaintiff's Third Supplement to Initial List of Witnesses and Documents Pursuant to
- 4 FRCP 26(a);
- 5 5. Plaintiff's Fourth Supplement to Initial List of Witnesses and Documents Pursuant to
- 6 FRCP 26(a);
- 7 6. Plaintiff's Fifth Supplement to Initial List of Witnesses and Documents Pursuant to
- 8 FRCP 26(a);
- 9 7. Plaintiff's Sixth Supplement to Initial List of Witnesses and Documents Pursuant to
- 10 FRCP 26(a);
- 11 8. Defendant's Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
- 12 9. Defendant's First Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP
- 13 26(f);
- 14 10. Defendant's Second Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 15 FRCP 26(f);
- 16 11. Defendant's Third Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 17 FRCP 26(f);
- 18 12. Defendant's Fourth Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 19 FRCP 26(f);
- 20 13. Defendant's Fifth Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP
- 21 26(f);
- 22 14. Defendant's First Set of Interrogatories to Plaintiff;
- 23 15. Plaintiff's Responses to Defendant Costco Wholesale Corporation's First Set of
- 24 Interrogatories;
16. Defendant's Second Set of Interrogatories to Plaintiff;
17. Plaintiff's Responses to Defendant Costco Wholesale Corporation's Second Set of
- Interrogatories;
18. Defendant's First Set of Request for Production of Documents to Plaintiff;

RANALLI ZANIEL FOWLER & MORAN, LLC  
 2340 W. HORIZON RIDGE PARKWAY, SUITE 100  
 HENDERSON, NEVADA 89052  
 TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

1 19. Plaintiff's Responses to Defendant Costco Wholesale Corporation's First Set of  
 2 Requests for Production of Documents;

3 20. Defendant's Second Set of Request for Production of Documents to Plaintiff;

4 21. Plaintiff's Responses to Defendant Costco Wholesale Corporation's Second Set of  
 5 Requests For Production of Documents;

6 22. Defendant's First Set of Requests for Admissions to Plaintiff;

7 23. Plaintiff's Responses to Defendant Costco Whole Corporation's First Set of Requests for  
 8 Admissions;

9 24. Defendant's Second Set of Requests for Admissions to Plaintiff;

10 25. Plaintiff's Responses to Defendant Costco Whole Corporation's Second Set of Requests  
 11 for Admissions;

12 26. Plaintiff's First Set of Interrogatories to Defendant;

13 27. Defendant Costco Wholesale Corporation's Responses to Plaintiff's First Set of  
 14 Interrogatories;

15 28. Deposition of Fendy Anna Wang;

16 29. Deposition of Leonardo A. Lopez;

17 30. Deposition of Meizhen Wang;

18 Under Local Rule 26-3(d), it is necessary to articulate a proposed schedule for  
 19 completing all remaining discovery. The parties are requesting only the expert and rebuttal  
 20 deadline be extended.

21 The following deadlines are requested.

- |   |                    |
|---|--------------------|
| 22 1. Discovery Cutoff Date:                | September 30, 2024 |
| 23 2. Amending the Pleadings/Adding Parties | July 1, 2024       |
| 24 3. Initial Expert Disclosure:            | September 2, 2024  |
| 4. Rebuttal Expert Disclosure:              | September 30, 2024 |
| 5. Dispositive Motions:                     | October 29, 2024   |
| 6. Joint Pre-Trial Order:                   | November 29, 2024  |

1 The parties hereby stipulate to the proposed changes in the discovery deadlines.

2  
3 IT IS SO STIPULATED.

4 May 31, 2024

May 31, 2024

5 **RANALLI ZANIEL FOWLER & MORAN,**  
**LLC**

**RICHARD HARRIS LAW FIRM**

6 */s/ George M. Ranalli*

*/s/ Clark Seegmiller*

7 **GEORGE M. RANALLI, ESQ.**

**CLARK SEEGMILLER, ESQ.**

Nevada Bar No. 5748

Nevada Bar No. 3873

8 **MAEGUN MOOSO, ESQ.**

801 South Fourth Street

Nevada Bar No. 15067

Henderson, NV 89101

9 2340 W. Horizon Ridge Parkway, Suite 100

Attorneys for Plaintiff

Henderson, Nevada 89052

10 Attorney for Defendant

11  
12  
13 **ORDER**

14  
15 IT IS HEREBY ORDERED.

16  
17 DATED: 6/3/2024

18   
19 JUDGE BRENDA WEKSLER  
20  
21  
22  
23  
24

RANALLI ZANIEL FOWLER & MORAN, LLC  
2340 W. HORIZON RIDGE PARKWAY, SUITE 100  
HENDERSON, NEVADA 89052  
TELEPHONE: (702) 477-7774 FAX: (702) 477-7778

**From:** Mysty D. Langford  
**To:** George Ranalli; Clark Seegmiller  
**Cc:** Maegun Mooso; Ashley Strange  
**Subject:** Re: Wang v. Costco  
**Date:** Friday, May 31, 2024 3:20:07 AM  
**Attachments:** image001.png

---

Clark indicates you may affix his e-signature.

**Mysty D. Langford**

Law Clerk

Direct Dial - 702-444-4367

Richard Harris Law Firm



Las Vegas	Reno
801 South 4th Street	6900 S. McCarran Blvd., #1010
Las Vegas NV 89101	Reno NV 89509
Ph. (702) 444-4444 x 297	Ph. (775) 222-2222



Please read the [Legal Disclaimer](#) that governs this email and any attachments.

---

**From:** George Ranalli <gmrnalli@ranallilawyers.com>  
**Sent:** Thursday, May 30, 2024 1:45 PM  
**To:** Mysty D. Langford <mlangford@richardharrislaw.com>; Clark Seegmiller <clark@richardharrislaw.com>  
**Cc:** Maegun Mooso <mmooso@ranallilawyers.com>; Ashley Strange <astrange@ranallilawyers.com>  
**Subject:** Wang v. Costco

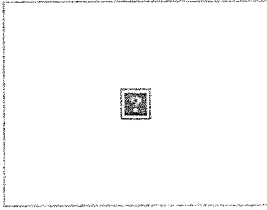
CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Clark and Mysty: here is the stip.. Can we use your electronic sig? we just adjusted the expert and rebuttal (per my conversation with Clark). Would like to get this to Court today..Thanks.

Ashley, please follow up with Mysty asap..Thanks.

George M. Ranalli, Partner  
RANALLI ZANIEL FOWLER & MORAN, TRIAL ATTORNEYS  
2340 W. Horizon Ridge Parkway, Suite 100  
Henderson, Nevada 89052  
702-477-7774 Office

702-477-7778 Fax



---

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.